**AMENDMENT HISTORY**

This document is reviewed periodically, at least annually, and is retained for a period of 5 years. Amendments and revisions are distributed to the named holders. The history of amendments and the issue of revisions are recorded below.

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| **Date** | **Amend. No.** | **Page No.** | **New Issue No.** | **Reason for Change** | **Authorised by** |
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**1-INTRODUCTION**

The General Data Protection Regulation 2018 regulates the way in which all personal data is held and processed. This is a statement of the data protection policy adopted by the Tungate Group. It applies to all Tungate Group employees.

In order to operate efficiently Tungate Group needs to collect and use information about the people with whom we work. This includes current, past and prospective employees, reviewers, professional experts, stakeholders, delegates and others with whom we communicate.

Tungate Group regards the lawful and correct treatment of personal information as integral to our successful operation, and to maintaining the confidence of the people we work with. To this end we fully endorse and adhere to the principles of the General Data Protection Regulation 2018.

**2-PURPOSE**

The purpose of this policy is to ensure that everyone handing personal information at Tungate Group is fully aware of the requirements of the Act and complies with data protection procedures and that data subjects are aware of their rights under the General Data Protection Regulation 2018.

Scope: Information covered by the General Data Protection Regulation 2018

'Personal data' covered by the General Data Protection Regulation 2018 is essentially any recorded information which identifies a living individual. Personal data held by Tungate Group will include contact information for a variety of stakeholders and other personal details.

**3-RESPONSIBILITY**

The Managers reports on any data protection matters to the Finance Director.

The Finance Director is the Data Controller has overall responsibility for compliance with the General Data Protection Regulation 2018, but, individual members of staff/the Data Processors are responsible for the proper use of the data they process.

**4- POLICY STATEMENT**

The General Data Protection Regulation 2018 and the rights of the individual are:

* The right to be informed
* The right of access
* The right to rectification
* The right to erasure
* The right to restricting processing
* The right to data portability
* The right to object
* Rights in relation to automated decision making and profiling

The General Data Protection principles are:

* Lawfulness, fairness and transparency
* Purpose limitation
* Data minimisation
* Accuracy
* Storage limitation
* Integrity and confidentiality

In order to meet the requirements of the principles Tungate Group will:

* Fully observe conditions regarding the fair collection, and use of information
* Meet its legal obligations to specify the purposes for which information is used
* Collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
* Ensure the quality and accuracy of the information used
* Hold personal information on Tungate Group systems for as long as is necessary for the relevant purpose, or as long as is set out in any relevant contract held with Tungate Group or Tungate Group's Information Retention Policy
* Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation 2018 (these include: the right to be informed that processing is being undertaken; the data subject's right of access to their personal information; the right to prevent processing in certain circumstances; the right to correct, rectify, block or erase information which is regarded as wrong information)
* Take appropriate technical and organisational security measures to safeguard personal information and;
* Ensure that personal information is not transferred outside the EEA without suitable safeguards.

**5-RESPONSIBILITIES FOR DATA PROTECTION AND CONFIDENTIALITY**

Tungate Group will ensure that there is someone with specific responsibility for data protection in the organisation. The nominated person is currently the Finance Director, Phil Elks. The Finance Director may be contacted at:

Finance Director

Brookhouse Way

Brook House Industrial Estate

Cheadle

ST10 1SR

01538 755755

philelks@tungate.co.uk

Tungate Group will ensure that:

* The Data Controller understands their role and their rights and responsibilities
* The Data Processors understand their role and the rights and responsibilities
* This policy is available to each member of staff
* The Data Controller and Data Processors are adequately trained in handling personal information
* Queries about handling personal information are dealt with promptly and courteously
* Clear processes and procedures are in place to show how all data is processed and held
* Data Protection Impact Assessments shall be completed for each data process and reviewed on an annual basis or as processes change
* The Finance Director, who approves all changes to policy and procedure.

**6-STAFF RESPONSIBILITY**

* All staff shall be aware of the requirements of the General Data Protection Regulation 2018 and how the rules apply to them.
* All staff must complete data protection induction and annual training.
* All staff have a responsibility to ensure that they respect confidential information in their possession and maintain information security. Disclosure of confidential information gained as part of your employment to a third party, or assisting others in disclosure, will be viewed by Tungate Group with the utmost seriousness.
* All staff are responsible for ensuring personal information is kept no longer than is necessary.
* All staff are responsible for making sure that all personal data held, is up-to-date, accurate and relevant.

For further advice, please contact the Finance Director.

**7-PRIVACY STATEMENT**

Tungate Group respects your privacy. The information that you provide us with, or that is gathered automatically, helps us to monitor our services and provide you with the most relevant information. More information on how Tungate Group safeguards your privacy in relation to websites, email, voicemail, social media, testing and training can be found on our website: www.tungate.co.uk/privacy.

**8-SUBJECT ACCESS REQUESTS**

Under the General Data Protection Regulation 2018 individuals have the right to access personal information Tungate Group may hold about them.

Tungate Group will take no longer than 30 days to provide this information. It will be sent via email to the requester in a clear and concise format.

If you wish to request such information please email philelks@tungate.co.uk or consult our guidance on making a subject access request.

**9-DATA PROTECTION COMPLAINTS PROCEDURE**

Tungate Group shall comply fully with its obligations under the General Data Protection Regulation 2018. If you have any questions or concerns regarding Tungate Group's management of personal data, including your right to access data about yourself, or if you feel TUNGATE GROUP holds inaccurate information about you, please contact Tungate Group's Finance Director, Phil Elks (details above).

If you feel that your questions or concerns have not been dealt with adequately or that a subject access request you have made to Tungate Group has not been fulfilled you can use Tungate Group's complaints procedure: www.tungate.co.uk/contact.

If you are still dissatisfied, you have the right to contact the office of the Information Commissioner Office (ICO), the independent body overseeing compliance with the General Data Protection Regulation 2018: http://ico.org.uk/.

**10-DATA BREACHES**

If a breach has occurred which is likely to result in a risk to the rights and freedoms of natural persons, then the following will be reported to the Supervisory Authority:

* The nature of the personal data breach
* The categories of personal data
* The approximate number of data subjects affected
* The approximate number of personal data records concerned
* The contact details for the point of contact here at TUNGATE GROUP
* The likely consequences of the personal data breach.
* The measures taken to address the personal data breach

**11-REVIEW**

This policy will be reviewed on an annual basis.